UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

BELCALIS MARLENIS ALMANZAR, *

*

Plaintiff, *

* Civil Action No.

v. * 1:19-cv-01301-WMR

*

LATASHA TRANSRINA KEBE et al., *

*

Defendants. *

DEFENDANT KEBE'S MOTION TO FILE DOCUMENTS UNDER SEAL

COMES NOW Latasha Kebe (hereinafter referred to as "Ms. Kebe"), by and through undersigned Counsel, and, pursuant to Fed. R. Civ. P. 5.2(d) and 26(c), the parties' Consent Protective Order (Dkt. 53), and Section II.J to Appendix H of this Court's Local Rules, respectfully requests that this Honorable Court enter an Order permitting Ms. Kebe to file the following supporting documents under seal:

- The following supporting documents to Kebe's Response to Plaintiff's Motion for Summary Judgment:
 - a. Defendant Kebe's Response to Plaintiff's Statement of Material Facts
 In Support of Plaintiff's Motion for Summary Judgment;
 - b. Defendant Kebe's Brief Opposing Plaintiff's Motion for Summary Judgment;

- c. Defendant Kebe's Statement of Additional Material Facts in Support of Brief Opposing Plaintiff's Motion for Summary Judgment (hereinafter referred to as "Kebe's ASMF";
- d. Exhibit A to Kebe's ASMF: Declaration of Sadeer Sabbak (hereinafter referred to as "Declaration");
- e. Exhibit 1 to Declaration: true and correct copies of documents bates numbered Kebe 010-013, 015, 018, 093-100, 106-107, 127-136, 145-147, 187-203, 261-263, 366-367, 370, 373, 376-377, 413-319, 422, 424, 426-428, 436-444, 4470447, and CARDI_000787;
- f. Exhibit 2 to Declaration: excerpts from the 11/19/20 Deposition of Latasha Kebe.
- g. Exhibit 3 to Declaration: excerpts from the 11/30/20 Deposition of Latasha Kebe.
- h. Exhibit 4 to Declaration: excerpts from the 11/29/20 Deposition of Cheick Kebe.

This Motion is supported by Defendant Kebe's Memorandum of Law, submitted contemporaneously herewith, and a Proposed Order, attached hereto.

CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14 point, a font and point selection approved by the Court in Local Rule 5.1(C).

Respectfully submitted this 25th day of January, 2021.

/s/Olga Izmaylova olga@silawatl.com Georgia State Bar No. 666858

/s/Sadeer Sabbak ssabbak@silawatl.com Georgia State Bar No. 918493

SABBAK & IZMAYLOVA, P.C. 1875 Old Alabama Road Suite 760 Roswell, Georgia 30076 p. (404) 793-7773 f. (678) 878-4911 Attorneys for Latasha Kebe

CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2021, I electronically filed Defendant Kebe's Motion to File Documents Under Seal, Brief in Support of Motion, and a Proposed Order with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/Olga Izmaylova olga@silawatl.com Georgia State Bar No. 666858

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